## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

**RACHEL STANLEY,** individually, and on behalf of all others similarly situated,

Plaintiff,

ν.

EPCON COMMUNITIES, LLC, et al.,

Defendants.

Case No. 2:21-cy-597-ALM

Chief Judge Algenon L. Marbley

Magistrate Judge Kimberly A. Jolson

## **STIPULATION OF DISMISSAL**

Plaintiff Rachel Stanley and Defendants Epcon Communities, LLC and Romanelli & Hughes Building Company, Inc. hereby stipulate to the dismissal of this action without prejudice, with each party to bear its own attorneys' fees and costs.

So Stipulated.

Respectfully submitted,

## /s/ Brian T. Giles

Brian T. Giles, *Trial Counsel* (0072806) The Law Offices of Brian T. Giles LLC 1470 Apple Hill Rd. Cincinnati, Ohio 45230 Telephone: (513) 379-2715 Brian@GilesFirm.com

Avi R. Kaufman (*pro hac vice*) Kaufman P.A. 400 NW 26<sup>th</sup> Street Miami, Florida 33127 Telephone: (305) 469-5881 kaufman@kaufmanpa.com

Attorney for Plaintiff and the Putative Class

s/Gerhardt A. Gosnell II (via auth. 5/6/21)

James E. Arnold, *Trial Counsel* (0037712) Gerhardt A. Gosnell II ARNOLD & CLIFFORD LLP 115 W. Main St., 4<sup>th</sup> Floor Columbus, Ohio 43215 Telephone: (614) 460-1600 jarnold@arnlaw.com

Counsel for Defendant Epcon Communities, LLC

s/Robert W. Trafford (via auth. 5/6/21)

Robert W. Trafford, *Trial Counsel* (0024447) Porter Wright Morris & Arthur LLP 41 South High Street, Suites 2800-3200 Columbus, Ohio 43215 (614) 580-2118 rtrafford@porterwright.com

Counsel for Defendant Romanelli and Hughes Building Company

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 6, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Brian T. Giles
Brian T. Giles